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 COUNSEL/ATTORNEYS OF RECORD

Craig Hill
 Name
3300 E. STEWART
LAS VEGAS, NEVADA 89101
790975
 Prison Number

2009 APR -1 A 10: 59

CLERK US DISTRICT COURT
DISTRICT OF NEVADA

BY _____ DEPUTY

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

Craig Hill 790975
 Plaintiff,

vs.

2:09-cv-00604-RLH-LRL

- #1 CITY OF LAS VEGAS MAYOR OSCAR GOODMAN
 #2 Municipal Judge George Assel
 #3 CITY ATTORNEY BENJAMIN R. JEDON
 #4 Contracted Attorney Edward J. Jagers ^{2nd} #8702
Chief K. Coyale
 #5 DIRECTOR OF DETENTION
 Defendant(s).

CIVIL RIGHTS COMPLAINT
 PURSUANT TO
 42 U.S.C. § 1983

A. JURISDICTION

- 1) This complaint alleges that the civil rights of Plaintiff, Craig Hill
 (Print Plaintiff's name)

who presently resides at 3300 E. STEWART, City Detention were

violated by the actions of the below named individuals which were directed against

Plaintiff at City Detention, Las Vegas, NV on the following dates
 (institution/city where violation occurred)

March 3rd, 2009, and _____
 (Count I) (Count II) (Count III)

Make a copy of this page to provide the below information if you are naming more than five (5) defendants

2) Defendant OSCAR GURMAN resides at 400 STEWART AVE CITY HALL
 (full name of first defendant) (address if first defendant)
 and is employed as MAYOR OF LAS VEGAS. This defendant is sued in his/her
 (defendant's position and title, if any)
☐ individual ☒ official capacity. (Check one or both). Explain how this defendant was
 acting

under color of law: IS RESPONSIBLE FOR ALL CITY EMPLOYEES WHO VIOLATED MY CITY ADMINISTRATION

3) Defendant Judge GEORGE ASSAL resides at RJC P.B. 3930
 (full name of first defendant) (address if first defendant)
 and is employed as PRESIDING JUDGE. This defendant is sued in his/her
 (defendant's position and title, if any)
☒ individual ☒ official capacity. (Check one or both). Explain how this defendant was
 acting

under color of law: VIOLATED FEDERAL RULES OF PROCEDURE (3) (5) (5.1A) (10) AND (12)

4) Defendant Beatrice E. Cohen resides at RJC P.B. 3930
 (full name of first defendant) (address if first defendant)
 and is employed as CITY ATTORNEY. This defendant is sued in his/her
 (defendant's position and title, if any)
☐ individual ☒ official capacity. (Check one or both). Explain how this defendant was
 acting

under color of law: FILED COMPLAINT 7 DAYS AFTER I SHOULD HAVE BEEN RELEASED.

5) Defendant Edward Vargas #8702 resides at 500 N. Rainbow Blvd #300
 (full name of first defendant) (address if first defendant)
 and is employed as ATTORNEY OF RECORD. This defendant is sued in his/her
 (defendant's position and title, if any)
☒ individual ☒ official capacity. (Check one or both). Explain how this defendant was
 acting

under color of law: ALLOWED ALL VIOLATIONS TO TAKE PLACE / INEFFECTIVE ASSISTANCE & CONSPIRACY

6) Defendant Chief R. Coyne resides at 3300 E. STEWART AVE
 (full name of first defendant) (address if first defendant)
 and is employed as DIRECTOR & DETENTION. This defendant is sued in his/her
 (defendant's position and title, if any)
 ___ individual ___ official capacity. (Check one or both). Explain how this defendant was
 acting

under color of law: Failed to release me after Judge Assad
ordered me released March 3rd 2009

7) Jurisdiction is invoked pursuant to 28 U.S.C. § 1343 (a)(3) and 42 U.S.C. § 1983. If you wish to assert jurisdiction under different or additional statutes, list them below.

B. NATURE OF THE CASE

1) Briefly state the background of your case.

I WAS ARRESTED ON 2-25-09. by the Metropolitan
Police Department for Possession Controlled Substance,
TRESPASS, AND possession of Drug paraphernalia. I WAS O.R.
RELEASED FROM C.C.D.C. ON 2-26-09 AND TRANSPORTED TO
CITY DETENTION CENTER AND BOOKED ON THE MISDEMEANOR
VIOLATIONS. I WENT TO COURT Municipal (6) DAYS LATER IN
DEPT. 3 Judge Assad, THERE WAS NO COMPLAINT FILED, AT WHICH
TIME I WAS TOLD BY THIS COURT THAT I WOULD BE
RELEASED, BUT INSTEAD I WAS KEPT IN CUSTODY AN ADDITIONAL
WEEK WITHOUT A COMPLAINT UNTIL 3-10-09 AT WHICH TIME
I WAS FORMALLY CHARGED. BUT I WAS DETAINED (13) DAYS
WITHOUT A CRIMINAL COMPLAINT OR BEING CHARGED.

C. CAUSE OF ACTION

COUNT I

The following civil rights has been violated: 4th AMENDMENT

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

I WAS ILLEGALLY DETAINED WITHOUT WARRANT OR COMPLAINT FOR (13) DAYS. Mayor Oscar Goodman employs the City employees who violated my rights. Judge Assad and City Attorney Bradford P. Jerbie was aware there was no complaint filed in a timely fashion as stated by law, but proceeded as if everything were O.K. Contract Attorney Edward Vargas Bar # 8702 fail to bring this up after being appointed to me by this court. And the Director of Detention allowed me to be falsely imprisoned in this facility knowing that due process was violated.

COUNT II

The following civil rights has been violated: 5th AMENDMENT

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

DUE PROCESS WAS VIOLATED WHEN JUDGE GEORGE ASSAO AND
CITY ATTORNEY BRADFORD TERPIS WILLINGLY AND KNOWINGLY KNEW
THAT A COMPLAINT WAS NOT FILED ON ME, BUT CHOSE TO
IGNORE THE FACT AND PROCEEDED AS IF EVERYTHING WAS IN
ACCORDANCE, WHICH ACTUALLY CAUSED FALSE IMPRISONMENT.

outline).

- a) Defendants: CITY of Las Vegas
- b) Name of court and docket number: Eighth Judicial District of Nevada clock count
- c) Disposition (for example, was the case dismissed, appealed or is it still pending?):
Still Pending
- d) Issues raised: FEDERAL PROCEDURE
RULES (8) (5) (5.1.F) (10) (12)
- e) Approximate date it was filed: March 17th, 2009
- f) Approximate date of disposition: N/A

- 2) Have you filed an action in federal court that was dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted?
___ Yes ☒ No. If your answer is "Yes", describe each lawsuit. (If you had more than three actions dismissed based on the above reasons, describe the others on an additional page following the below outline.)

Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: _____
- b) Name of court and case number: _____
- c) The case was dismissed because it was found to be (check one): ___ frivolous
___ malicious or ___ failed to state a claim upon which relief could be granted.
- d) Issues raised: _____
- e) Approximate date it was filed: _____
- f) Approximate date of disposition: _____

Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: _____
- b) Name of court and case number: _____

- c) The case was dismissed because it was found to be (check one): _____ frivolous
_____ malicious or _____ failed to state a claim upon which relief could be granted.
- d) Issues raised: _____

- e) Approximate date it was filed: _____
- f) Approximate date of disposition: _____

Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: _____
- b) Name of court and case number: _____
- c) The case was dismissed because it was found to be (check one): _____ frivolous
_____ malicious or _____ failed to state a claim upon which relief could be granted.
- d) Issues raised: _____

- e) Approximate date it was filed: _____
- f) Approximate date of disposition: _____

- 3) Have you attempted to resolve the dispute stated in this action by seeking relief from the proper administrative officials, e.g., have you exhausted available administrative grievance procedures? ☒ Yes ☐ No. If your answer is "No", did you not attempt administrative relief because the dispute involved the validity of a: (1) _____ disciplinary hearing; (2) _____ state or federal court decision; (3) ☒ state or federal law or regulation; (4) _____ parole board decision; or (5) _____ other _____.
- If your answer is "Yes", provide the following information. Grievance Number _____
- Date and institution where grievance was filed _____

Response to grievance: NO GRIEVANCE PROCEDURES AT LAS VEGAS
CITY JAIL, SO I FILED A WRIT FOR HABEAS
CORPUS. (JURY TRIAL DEMANDED)

E. REQUEST FOR RELIEF

I believe that I am entitled to the following relief:

PUNITIVE DAMAGES of \$ 10,000 per defendant
in his/her official capacity
and

ANOTHER \$ 10,000 For Gross negligence
Individual capacity per defendants Judge
GEORGE ASSAD and attorney Edward J. Jorgas
Bar # 8702.

I understand that a false statement or answer to any question in this complaint will subject me to penalties of perjury. **I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.** See 28 U.S.C. § 1746 and 18 U.S.C. § 1621.

Joanna Williams
(Name of Person who prepared or helped
prepare this complaint if not Plaintiff)

Chris Hill #790975
(Signature of Plaintiff)

3-18-09
(Date)

(Additional space if needed; identify what is being continued)